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GARDNER, J

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HANNA BOUVENG,

JOINT PRE-TRIAL ORDER

Plaintiff,

Docket No. 14-CV-5474 (PGG)

-against-

NYG CAPITAL LLC d/b/a NEW YORK GLOBAL
GROUP, FNL MEDIA LLC, and BENJAMIN
WEY,

Defendants.

X

ii. TRIAL COUNSEL

COUNSEL FOR PLAINTIFF:

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COUNSEL FOR DEFENDANT:

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iii. SUBJECT MATTER JURISDICTION

Plaintiff: Jurisdiction is based upon complete diversity of the parties, pursuant to Title 28 of the United States Code, Section 1332. Plaintiff contends her damages are in excess of the jurisdictional requisite. Plaintiff is a resident of Sweden; Wey, NYG Capital LLC d/b/a New York Global Group ("NYGG") and FNL Media are residents of New York. Jurisdiction is not disputed.

Defendants: Defendants do not dispute the presence of subject matter jurisdiction. Defendants had included in the pending motion to dismiss an argument that Plaintiff's breach of contract claim (thirteenth cause of action) was without subject matter jurisdiction. However, Defendants will formally notify the Court by letter that they are withdrawing that argument.

iv. CLAIMS/DEFENSES TO BE TRIED

Plaintiff:

Plaintiff Hanna Bouveng alleges that during her employment with Defendants NYGG and FNL Media, she was subjected to gender discrimination, a sexually hostile work environment and *quid pro quo* sexual harassment by the company's highest-ranking supervisor, Defendant Benjamin Wey, in violation of NYSHRL and NYCHRL.

Ms. Bouveng alleges Mr. Wey sexually harassed, assaulted and battered her, and intentionally inflicted emotional distress upon her, in his capacity as CEO of NYGG and Publisher of FNL Media's on-line magazine, TheBlot.

Ms. Bouveng further alleges that Defendant Wey, as NYGG's CEO and FNL Media's Publisher, has subjected her to ongoing retaliation for her refusal to submit to his sexual advances and for her pursuit of this lawsuit, in violation of NYSHRL and NYCHRL. Ms. Bouveng alleges that this retaliation not only led to her subjection to unwarranted disciplinary treatment, the demotion of her duties, the termination of her employment, and her eviction from her apartment, but also culminated in ongoing harassment by Mr. Wey, including his stalking of her on-line and in Sweden, as well as other means of intimidation and harassment by Mr. Wey of Ms. Bouveng, her family, her friends, her associates and her lawyers.

Ms. Bouveng also alleges that Wey has repeatedly defamed her via FNL Media's digital on-line magazine TheBlot, falsely labeling her as an alcoholic, a drug addict, a prostitute, an extortionist and a fugitive from the United States.

Ms. Bouveng alleges that during her employment, Defendants NYGG and FNL Media also subjected her to gender discrimination, a sexually hostile work environment, and retaliation, in violation of NYCHRL and NYSHRL, as well as defamation, and are responsible for Wey's *quid pro quo* sexual harassment, retaliation and personal torts that were perpetrated in his capacity as CEO and Publisher.

Finally, Ms. Bouveng alleges that Defendants breached the August 28, 2014 Agreement intended to stop Defendants from further harassing and defaming Plaintiff, her family, her friends and her lawyers by publishing matters prohibited in the Agreement every day since October 4, 2014.

Plaintiff has voluntarily dismissed her claims for Stalking and Harassment as those claims are incorporated by her Intentional Infliction of Emotional Distress and Assault claims.

The legal arguments previously made by Plaintiff in her Opposition to Defendants' Motion to Dismiss and in her motions for injunctive relief are incorporated by reference herein.

Defendants:

Defendants deny plaintiff's allegations above. That said, at the time of this filing, Defendants' motion to dismiss is pending and, accordingly, Defendants have not yet served an answer. Thus, no defenses or counterclaims have yet to be asserted. Defendants will supplement this submission after they assert their defenses and counterclaims.

v. DAMAGES

Plaintiff alleges that as a consequence of Defendants' conduct, she has suffered fear of imminent harm, physical injury and severe emotional distress. Plaintiff maintains she is entitled to compensatory damages of \$25 million for each cause of action, as well as punitive damages of \$50 million for each of those causes of action arising under NYC Human Rights law (sexual harassment, sexually hostile work environment, gender discrimination and retaliation) and under tort common law (assault, battery, intentional infliction of emotional distress and defamation.)

Plaintiff alleges that her compensatory damages are for the emotional distress she suffered as a consequence of Defendant's actions. This emotional distress includes but is not limited to her distress, anxiety, fear, worry, depression, upset, sleepless disturbance, insomnia, nightmares, headaches, gastrointestinal distress, embarrassment and humiliation.

Plaintiff alleges that as a consequence of Defendants' breach of the August 28, 2014 Agreement intended to stop Defendants' publishing of offensive, defamatory and retaliatory articles, Plaintiff is entitled to liquidated damages of \$10,000 for each daily violation since Defendants' initial violation of October 4, 2014, in an amount as of April 16, 2015 totaling \$1,940,000.

Plaintiff alleges that she is also entitled to attorneys' fees and costs under NYC Human Rights Law.

Plaintiff also alleges that she is entitled to injunctive relief from the Court to restrain Defendants from further retaliation, harassment and defamation of Ms. Bouveng.

Defendants allege that Plaintiff has not suffered compensable harm, is not entitled to

damages, and has failed to articulate damages as the Court requires in its Individual Rules.

vi. TRIAL BY JURY

Plaintiff has requested a trial by jury. Plaintiff anticipates the trial shall take five to seven days. Defendants will similarly request a trial by jury when they are required to file a responsive pleading. Defendants anticipate that the trial will take seven to nine trial days.

vii. TRIAL BY MAGISTRATE

The parties have not agreed to a trial by magistrate.

viii. STIPULATIONS OR AGREED STATEMENTS

1. Hanna Bouveng is a Swedish citizen.
2. Benjamin Wey is the CEO of NYGG.
3. James Baxter is the Chairman and General Counsel of NYGG.
4. Benjamin Wey and James Baxter supervised Ms. Bouveng's work.
5. Yonatan Weiss worked at FNL Media as a graphic designer for TheBlot.
6. Alicia Lu worked at FNL Media as an editor for TheBlot.
7. Hanna Bouveng moved into an apartment, located at 25 Broad Street #8G, on December 1, 2013.
8. Benjamin Wey fired Hanna Bouveng on April 22, 2014.
9. Hanna Bouveng's friend Chemme Koluman came to Ms. Bouveng's apartment on April 22, 2014 while Ms. Bouveng was packing and spoke to Mr. Wey.
10. In August 2014, Benjamin Wey entered the Café in Stockholm where Hanna Bouveng is employed and saw Hanna Bouveng.

As to Legal Issues:

11. With respect to Plaintiff's claims for punitive damages, the parties agree that there should be a bifurcation of the trial: evidence relating to liability, compensatory damages, and the entitlement to punitive damages will take place in the primary phase; after those issues are determined, and if necessary, evidence as to the Defendants' financial condition/net worth and a trial on the amount of punitive damages will take place in a second phase.

12. With respect to Plaintiff's claim for Defamation (twelfth cause of action), the parties agree that because Plaintiff will not be seeking economic damages, and because defamation claims based on statements that do not constitute defamation *per se* require evidence and proof of special damages (which are economic damages), Plaintiff will need to establish that the statements it claims to be defamatory constitute defamation *per se* under New York law.
13. With respect to Plaintiff's claims under the New York State Human Rights Law and the New York City Human Rights Law, the currently existing eight causes of action in the complaint will be reduced to four with the parties attempting in good faith to agree on jury instructions for those claims. Specifically, the jury will be presented with two claims under the New York State Human Rights Law (sexual harassment and retaliation) and two claims under the New York City Human Rights Law (sexual harassment and retaliation).

ix. LISTS OF PROSPECTIVE WITNESSES

Plaintiff:

- 1) Hanna Bouveng
- 2) Benjamin Wey
- 3) James Baxter
- 4) Michaela Wey
- 5) James Chauvet
- 6) Nils Sundqvist
- 7) Chemme Koluman
- 8) Yonatan Weiss
- 9) Alicia Lu
- 10) Matthew Abisch
- 11) Sophie Darsot
- 12) Nina Chelidze
- 13) Peter Byrnes
- 14) William Scholander
- 15) Talman Harris
- 16) Jonas Wilhelmsson
- 17) Carol Wittenberg
- 18) David Ratner (in the event that the breach of contract cause of action is not severed)
- 19) Martha McBrayer (in the event that the breach of contract cause of action is not severed)
- 20) Plaintiff reserves the right to call witnesses listed on Defendants' witness list.

Defendants:

- 1) Baxter, James
- 2) Bostany, John
- 3) Bostrom, Amanda
- 4) Chauvet, James
- 5) Chelidze, Nina
- 6) Cruz, Melinda
- 7) Cuccarro, Mark (Plaintiff objects to this witness because he was not previously disclosed)¹
- 8) Durand, Guy
- 9) Eriksson, Madeleine
- 10) Habinsky, Jason (Plaintiff objects to this witness because he was not previously disclosed)
- 11) Juceam, Jason (Plaintiff objects to this witness because he was not previously disclosed)
- 12) Kibrik, Alex (Plaintiff objects to this witness because he was not previously disclosed)
- 13) Larson, Dan
- 14) Larson, D.A. (Plaintiff objects to this witness because he was not previously disclosed)
- 15) Norval, Sam
- 16) Olsen, Adam
- 17) Salas, Madelynn
- 18) Sher, Justin (Plaintiff objects to this witness because he was not previously disclosed)
- 19) Siegal, David (Plaintiff objects to this witness because he was not previously disclosed)
- 20) Spacher, Daniel
- 21) Wey, Benjamin
- 22) Wey, Michaela
- 23) Ziv, Dr. Barbara
- 24) Custodian of Records/Witness to explain records of T-Mobile
- 25) Custodian of Records/Witness to explain records of Crunch
- 26) Defendants reserve the right to call witnesses listed on plaintiff's witness list

x. DESIGNATION OF DEPOSITION EXCERPTS

Plaintiff's Affirmative Designations:

- 1) March 11, 2015 Deposition Transcript of James Baxter at Pages: 69:, 84, 96-98,

¹ Defendants disagree with Plaintiff's characterization as to which witnesses were not "previously disclosed." Defendants' decision not to assert objections to Plaintiff's witnesses in this Joint Pre-Trial Order, something not called for by the Court's rules, should not be viewed as a waiver of Defendants' right to object to witnesses Plaintiff may seek to call at trial.

101-102 [Defendants object to lines 97:18-98:2 and 98:16-17. Also given that specific pages/lines were not provided, defendants reserve the right to further object when and if plaintiff provides further detail].

Defendants Cross-Designations for the Deposition of James Baxter: 85:16-86:15; 99:14-101:10;

2) March 12, 2015 Deposition Transcript of Michaela Wey at: 16:13-17:11; 17:25-18:16; 19:5-19; 19:25-20:2; 20:22-21:7; **22:15-18; 24:15-21; 25:20-23**; 38:5-18; 41:19-42:5; 42:22-43:12; 45:8-20; 48:6-18; 49:2-25; 50:25-51:10; 51:17-52:18; 53:1-55:8; **55:18-22**; 56:5-57:3; **57:17-58:15** (defendants object to **58:8-15**); 61:17-25; **63:12-18**; 64:9-65:13; **65:22-66:4** (defendants note that **66:3** should be removed); 66:21-68:16; 69:9-71:4; **72:1-73:13**; **73:24-74:19**; **75:1-75:24**; 76:9-19; 77:21-81:16; 83:24-84:4; 86:11-89:19; 90:16-94:11; 95:15-96:8; 111:109:11-15, 111:6-112:22; **113:10-21**; 114:12-115:1; 115:25-116:13; 117:7-118:3 (defendants note that line **117:22** should be removed); 118:12-17; 119:17-25; **120:21-121:1**; **121:25-122:4**; 127:22. [Defendants object to all portions plaintiff designated that appear in bolded red above unless some lesser portion is specifically objected to by page and line number]

Defendants' Cross Designations for the deposition of Michaela Wey:

Witness	Line Designations
Wey, Michaela	8:13-25 10:7-11:23 12:2-4 13:1-14:6 14:16-19 16:24-17:11 17:13-24 18:8-20:7 20:19-21:19 35:16-36:1 36:24-37:9 38:5-40:4 41:19-42:10 43:13-46:12 46:25-48:1 48:10-18 49:2-3 49:7-51:10 51:17-54:24 55:18-20 55:22-56:4 56:16-57:13 57:17-58:3

Witness	Line Designations
	59:14-22 60:8-20 60:25-61:3 65:14-24 68:5-16 69:9-71:4 76:9-79:6 84:5-8 84:10-85:1 85:13-19 85:21-24 86:1-87:20 89:3-10 90:8-91:9 94:12-95:8 95:15-22 97:13-99:15 99:20-100:4

3) April 6, 2015 Deposition Transcript of Madeleine Eriksson at: 7:10-18; 9:12-22; 11:-20-12:1013:17-22; 14:17-15:24; 16:11-17:18; 18:12-20:9; **24:3-25:21** (defendants object to **25:19-21**); **26:6-27:21** (defendants object to **26:6-15**); 28:7-29:24; 31:23-32:9; 32:16-34:20; **36:16-20**; **37:6-17**; **38:20-39:25**; 41:8-19; 42:8-14, 20-43:23; 44:10-45:1; 45:22-46:4; 47:14-48:15; 48:24-49:17; 49:24-51:13, 22-23; 53:24-54:6; 55:3-5; 55:10-58:6; 58:20-59:15; **60:14-62:2**; **63:24-64**; **65:5-67:13**; **67:24-69:8**, **21-70:7**; **71:13-71:5**; **72:13-73:20**; **74:2-76:14**; **76:25-78:8**; **78:15-19**, **24-79:4**; **79:12-25**; **80:4-9**; **82:15-21**; **83:14-86:19**; **87:24-90:19** (defendants object to **87:24-88:14**); 91:11-12; 92:8-17; 94:10-16; 97:9-23; 99:20-24; 101:20-102:7; 103:17-22; 105:5-9. [Defendants object to all portions plaintiff designated that appear in bolded red above unless some lesser portion is specifically objected to by page and line number]

Defendants' Affirmative Designations²:

Witness	Line Designations
Chauvet, James	8:11-14 13:23-14:21 14:24-20:17 21:2-20 21:24-22:24 23:20-24:9 24:22-27:5 28:24-29:18 29:23-25 30:4-22 30:25-31:3 31:23-25 32:7-19 34:6-11 34:21-37:16 42:12-43:3 44:25-45:15 47:10-49:25 50:19-51:11 52:8-20 52:23-53:8 53:24-54:12 54:16 54:19-55:18 55:21-56:8 58:22-59:2 59:5-9 61:12-17 61:22-62:7 62:13-66:20 76:10-17 77:10-25 78:9-22 78:25-79:18 81:11-13 81:24-82:22 83:7-14

2 Defendants reserve the right (a) to elect not to introduce some or all of the testimony designated herein, (b) to cross-designate additional testimony from the listed depositions, or from other depositions or hearing testimony, based upon designations made by Plaintiff, and (c) to designate additional testimony from the listed depositions, or from other depositions or hearing testimony, should witnesses under Defendants' control, or Plaintiff, unexpectedly become unavailable to testify live.

Witness	Line Designations
	83:20-24 84:4-5
Eriksson, Madeleine	6:18-13:13 13:17-23:13 23:17-25:19 26:16-31:3 41:7-43:6 43:24-45:2 45:22-48:18 48:21-49:6 49:8-23 50:21-53:20 55:22-58:9 58:11-15 82:3-12 86:25-87:22
Koluman, Chemme	7:20-8:8 8:23-10:24 11:3-12:15 12:25-14:14 16:15-17:5 17:16-21:20 22:17-23:12 23:16-23 24:17-26:10 26:13-28:13 28:17-25 29:4-30:2 36:24-38:10 40:16-41:10 42:12-43:4 44:4-13 54:7-56:3 56:7-60:25 65:23-68:19 69:9-10 69:14-21 69:24-70:20 70:24-71:17 73:12-25 81:13-82:3 84:10-86:17 88:12-89:2 90:24-92:20

Witness	Line Designations
	93:23-96:4 98:17-99:15 100:16-101:9 103:19-104:15 105:14-24 110:22-24 111:14-113:18 113:24-114:8 115:3-116:22 124:7-125:12 142:2-21 144:11-145:146:12 146:19-22
Lu, Qing (Alicia)	8:8-19 9:11-11:12 11:17-21 12:3-14:17 18:16-19:4 19:7-22:20 25:24-26:14 28:2-29:2 42:12-43:21 44:2-45:7 51:3-54:5 57:16-18 65:12-66:3 66:6 67:10-68:20 69:18-70:7 72:18-73:11 79:20-80:3 82:7-83:25 84:20-86:13 88:22-92:16 96:9-21 99:6-25 107:7-108:4 112:11-114:23
Sundqvist, Nils	1. 7:5-14 2. 7:24-8:21 3. 11:9-22 4. 15:8-17:24 5. 18:18-22 6. 19:12-22

Witness	Line Designations
	7. 21:11-22:15 8. 24:3-10 9. 24:17-19 10. 25:7-8 11. 25:11-26:14 12. 26:20-27:7 13. 27:10-14 14. 27:17-28:11 15. 29:9-23 16. 30:4-22 17. 31:5-32:9 18. 32:25-34:4 19. 34:13-35:12 20. 35:23-36:20 21. 36:23 22. 38:17-39:15 23. 41:15-42:18 24. 47:5-14 25. 47:19-22 26. 48:9-13 27. 48:19-23 28. 49:25-53:22 29. 54:13-55:7 30. 55:10-13 31. 55:16-57:19 32. 58:11-59:11 33. 59:18-60:4 34. 60:6-61:20 35. 61:25-62:17 36. 63:13-64:3 37. 64:10-16 38. 64:21-22 39. 65:8-66:15 40. 66:20-67:8 41. 76:3-10 42. 76:21-77:9 43. 77:11-19 44. 77:25-78:14 45. 79:11-80:4

Witness	Line Designations
	46. 80:10-17
	47. 80:25-81:25
	48. 82:22-83:21
	49. 83:25-84:4
	50. 85:21-87:16
	51. 96:8-21

Plaintiff has no objection to any of the deposition excerpts, except those which shall be the subject of Plaintiff's motions *in limine*.

ix. LISTS OF EXHIBITS

Plaintiff's Exhibits/Defendants' Objections

Plaintiff's Exhibit Number	Bates Number	Admit/Object	Reason
1	PLTF 01007-01011	Object	402, 403, 404, 408, hearsay, IL ³
2	DEFS001587-DEFS001592	Admit	
3	PLTF 01084-01087	Admit	
4	PLTF 01012-01056	Object	402, 403, 404, hearsay, IL
5	PLTF 00930	Admit	
6	LCOR 001-047	Object	402 (portions), redact personal and financial info, 402, 403
7	PLTF 01090-01091	Object	402
8	DEFS001570	Admit	
9	PLTF 00508	Object	Language
10	PLTF 00265-00269	Admit	
11	PLTF 00164-00172	Admit	
12	PLTF 00433-00434	Admit	
13	PLTF 00429-00432	Admit	
14	PLTF 01139-01143	Admit	
15	PLTF 00441-00442	Admit	
16	DEFS001537-001555	Object	Composite

³ Numbers refer to the Federal Rules of Evidence; "IL" refers to a matter Defendants intend to brief as part of a motion *in limine*.

			disorganized and confusing, 403
17	PLTF00063-00064	Object	Auth./hearsay, completeness
18	PLTF00065-00069	Object	Auth./hearsay, completeness
19	PLTF00383-00384	Admit	
20	PLTF00252	Object	402, 403, 404, 408, hearsay, IL
21	DEFS001557-001569	Admit	
22	PLTF00255-00264	Admit	
23	LCOR048	Object	Auth./hearsay, 402, 403
24	PLTF00386-00387	Admit	
25	DBP 000001-000015	Object	Auth./hearsay, relevance
26	DEFS001029	Admit	
27	PLTF01773-01807	Object	Auth., accuracy, transcript not evid.
27A	Recording	Object	Auth., completeness
28	PLTF00246-00249	Admit	
29	PLTF00004-00007	Object	Auth./hearsay, completeness
30	PLTF00250-00251	Admit	
31	PLTF00302-00304	Admit	
32	PLTF00317-00319	Object	Auth./hearsay, completeness
33	PLTF00320-00322	Object	Auth./hearsay, completeness
34	PLTF00325-00347	Admit	
35	PLTF00361-00374	Admit	
36	PLTF00348-00360	Admit	
37	PLTF00132-00144	Object	Auth./hearsay, completeness
38	PLTF00180-00191	Admit	
39	PLTF01145	Object	Auth./hearsay, transcripts not evid.
40	DEFS001571-001572	Admit	
41	PLTF01146-01150	Admit	
42	PLTF00275-00282	Admit	
43	PLTF00288-00289	Admit	
44	PLTF00283-00287	Admit	
45	PLTF00272-00274	Admit	
46	PLTF00177-00179	Admit	
47	PLTF00948-00950	Object	Auth./hearsay,

			completeness
48	PLTF00951-00952	Object	Auth./hearsay, completeness
49	PLTF01164	Object	Auth./hearsay, completeness
50	PLTF01165	Object	Auth./hearsay, completeness
51	PLTF00960-00970	Object	Auth./hearsay, completeness, 403, IL
52	PLTF01167	Object	Auth./hearsay, completeness
53	PLTF00011-00013	Object	Auth./hearsay, completeness
54	PLTF00168	Object	Auth./hearsay, completeness, 403, IL
55	PLTF01865-1900	Object	402, 403, 404, hearsay, IL
56	PLTF00975-00989	Object	402, or admit w/ limiting instruction
57	PLTF01191-01249	Object	Auth./hearsay, completeness
58	PLTF01250	Object	Auth./hearsay, completeness
59	PLTF00106-00107	Object	Auth./hearsay, completeness, language
60	PLTF00990-00997	Object	402, or admit w/ limiting instruction
61	DEFS002584-002592	Object	402, or admit w/ limiting instruction
62	DEFS002562-002566	Object	Auth./hearsay, completeness
63	PLTF01254-01268	Object	402, or admit w/ limiting instruction
64	DEFS002436-DEFS002445	Object	402, or admit w/ limiting instruction
65	PLTF01272-01275	Object	Auth./hearsay, completeness
66	PLTF01278-01293	Object	402, or admit w/ limiting instruction
67	PLTF00923-00924	Object	Auth./hearsay, completeness, 402
68	PLTF01331-01343	Admit	
69	DEFS002546-002552	Object	402, or admit w/

			limiting instruction
70	PLTF01344-01350	Object	Auth./hearsay, completeness
71	PLTF01351-01358	Object	402, or admit w/ limiting instruction
72	PLTF01359-01363	Object	Auth./hearsay, completeness, 402
73	DEFS002553-002561	Object	402, or admit w/ limiting instruction
74	PLTF00446-00449	Object	Auth./hearsay, completeness, 402, language
75	PLTF01364-01370	Object	Auth./hearsay, completeness, 402
76	DEFS002532-002545	Object	402, or admit w/ limiting instruction
77	DEFS002636-002653	Object	402, or admit w/ limiting instruction
78	DEFS000723-000724	Admit	
79	PLTF00443-00445, 01057-01059	Object	Auth./hearsay, completeness, 402, language
80	PLTF01407	Object	Auth./hearsay, completeness, 402
81	PLTF01408-01425	Object	Auth./hearsay, completeness
82	PLTF01426-01450	Object	Auth./hearsay, completeness
83	PLTF01451-01479	Object	402, or admit w/ limiting instruction
84	PLTF01480-01498	Object	Auth./hearsay, completeness
85	PLTF01499-01531	Object	Auth./hearsay, completeness
86	PLTF01532-01556	Object	402, or admit w/ limiting instruction
87	PLTF01557-01587	Object	402, or admit w/ limiting instruction
88	PLTF01588-01597	Object	402, or admit w/ limiting instruction
89	PLTF01598	Object	Auth./hearsay, completeness
90	DEFS002487-002500	Object	402, or admit w/ limiting instruction
91	DEFS002501-002508	Object	402, or admit w/ limiting instruction

92	PLTF00470-00474	Object	Auth./hearsay, completeness, 402
93	DEFS002509-002531	Object	402, or admit w/ limiting instruction
94	PLTF01599-01609	Object	402, or admit w/ limiting instruction
95	PLTF01610-01648	Object	402, or admit w/ limiting instruction
96	PLTF01649-01670	Object	402, or admit w/ limiting instruction
97	PLTF01671-01694	Object	402, or admit w/ limiting instruction
98	PLTF01695-01729	Object	402, or admit w/ limiting instruction
99	PLTF01070-01083	Object	402, 403, 404, hearsay, IL
100	PLTF01736-01772	Object	402, or admit w/ limiting instruction
101	PLTF01125-01126	Object	Auth./hearsay, completeness, 402
102	DEFS003370-003374	Object	Auth./hearsay, completeness, 402, language
103	DEFS001496-001500	Object	Auth./hearsay, completeness, 402
104	PLTF01864	Object	402, 403, 404, hearsay, IL, transcript not evid.
104A	Video	Object	402, 403, 404, hearsay, IL
105	PLTF00475-00480	Object	Auth., accuracy, transcript not evid.
105A	Recording Part 1	Object	Auth., completeness
105B	Recording Part 2	Object	Auth., completeness
106	PLTF00088	Object	402, auth.
107	PLTF00108-00109	Object	Auth./hearsay, completeness
108	PLTF00456-00461	Object	Auth./hearsay, completeness
109	PLTF01865-01866	Object	Auth
110	Video	Object	
111	PLTF01868-01878	Object	402, 403, 404, 408, hearsay, IL
112	DEFS0033339	Admit	Auth/402, 403, completeness

Defendants' Exhibits/Plaintiff's Objections

Exhibit Letter	Bates Range	Admit/Object	Reason
A	DEFS000002	Object	Relevance
B	DEFS000005	Object	Relevance
C	DEFS000012-000014	Object	Authenticity, Relevance
D	DEFS000033, DEFS000035, DEFS000040, DEFS000042, DEFS000044, DEFS000046	Object	Relevance
E	DEFS000047	Object	Relevance
F	DEFS000063	Object	Relevance
G	DEFS000072	Admit	
H	DEFS000076	Object	Relevance
I	DEFS000085-000086	Object	Relevance
J	DEFS000099	Object	Relevance
K	DEFS000100	Object	Relevance
L	DEFS000101	Object	Relevance
M	DEFS000105	Object	Relevance, Not Exchanged
N	DEFS00129	Object	Not exchanged
O	DEFS000142	Object	Relevance
P	DEFS000589	Object	Relevance
Q	DEFS000613-000618	Object	Relevance
R	DEFS000639-000640	Admit	
S	DEFS000723-000724	Admit	
T	DEFS000734-000752	Object	Relevance
U	DEFS000892	Object	Relevance

Exhibit Letter	Bates Range	Admit/Object	Reason
V	DEFS000910	Object	Relevance
W	DEFS001022-001028	Admit	
X	DEFS001042-001043	Admit	
Y	DEFS001101	Admit	
Y-1	Unstamped version of DEFS001101	Admit	
Z	DEFS001167	Object	Relevance
AA	DEFS001178	Object	Relevance
AB	DEFS001216	Object	Relevance
AC	DEFS001250	Object	Relevance
AD	DEFS001349-001350	Object	Relevance
AE	DEFS001380-001381	Object	Relevance
AF	DEFS001388-001389	Object	Relevance
AG	DEFS001391	Object	Relevance
AH	DEFS001537-001539	Admit	
AI	DEFS001540	Admit	
AJ	DEFS001542-001544	Admit	
AK	DEFS001546-001551	Admit	
AL	DEFS002326-002335	Object	Relevance
AM	DEFS002341-002344	Object	Relevance
AN	DEFS002350	Admit	
AO	DEFS002354	Admit	
AP	DEFS002356	Admit	

Exhibit Letter	Bates Range	Admit/Object	Reason
AQ	DEFS002357	Admit	
AR	DEFS003213-003214	Object	Unable to open file
AS	DEFS003298-003304	Object	Relevance
AT	DEFS003343	Object	Relevance
AU	DEFS003361-003362	Object	Relevance
AV	DEFS 1st production video	Object	Unable to locate
AW	DEFS 1st production video	Object	Unable to locate
AX	DEFS 5th production video	Object	Unable to locate
AY	DEFS 7th production video	Object	Unable to locate
AZ	00001	Admit	
BA	00014-00015	Object	Relevance
BB	00061-00062	Object	Relevance
BC	00093-00099	Admit	
BD	00153	Admit	
BE	00160-00161	Admit	
BF	00246-00248	Admit	
BG	00265-00269	Admit	
BH	00393-00394	Admit	
BI	00441-00442	Admit	
BJ	00694-006954	Object	Relevance
BK	01849-01852	Admit	
BL	01865-01866	Admit	

Exhibit Letter	Bates Range	Admit/Object	Reason
BM	LCOR034-035	Admit	
BN	T-Mobile phone records for (917)436-6547	Object	Relevance
BO	Chase bank account records	Object	Relevance
BP	CRUNCH000001-000017	Object	Relevance
BQ	Babson College announcement	Object	Relevance
BR	Photo	Object	Relevance
BS	11/6/2013 Chain of emails between H. Bouveng, D. Larson and B. Wey	Object	Relevance, Not Previously Produced
BT	12/24/2013 JetBlue travel itinerary	Object	Relevance
BU	1/16/2014 Email from eTickets@amtrak.com to A. Olsen	Object	Relevance
BV	1/24/2014 Email from eTickets@amtrak.com to A. Olsen	Object	Relevance
BW	1/24/2014 Chain of emails between A. Olsen and H. Bouveng	Object	Relevance
BX	2/18/2014 Chain of emails between H. Bouveng, B. Wey and J. Baxter	Admit	
BY	3/6/2014 Chain of emails between A. Olsen and H. Bouveng	Object	Relevance
BZ	9/17/2014 M. McBrayer email to J. Sher	Object	Relevance
CA	9/17/2014 M. McBrayer email to J. Sher	Object	Relevance
CB	9/30/2014 M. McBrayer letter to Judge Gardephe	Object	Relevance
CC	9/30/2014 J. Sher letter to M. McBrayer	Object	Relevance
CD	9/30/2014 M. McBrayer email to J. Sher	Object	Relevance
CE	10/1/2014 M. McBrayer letter to J. Sher	Object	Relevance

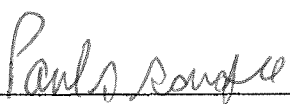
Exhibit Letter	Bates Range	Admit/Object	Reason
CF	1/1/2015 Chain of emails between J. Sher and D. Ratner	Object	Relevance

SO ORDERED:

Dated: New York, New York

~~May 15, 2015~~

June 11, 2015


 Paul G. Gardephe
 United States District Court Judge

CONSENTED TO:

MORELLI ALTERS RATNER LLP
 Attorneys for Plaintiff Hanna Bouveng



/s/David Ratner
 By: David Ratner (DR-7758)

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 Attorneys for Defendants NYG Capital LLC d/b/a
 New York Global Group, FNL Media LLC and Benjamin Wey

/s/ Glenn Colton
 By: Glenn Colton (GC-2493)